

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

PAUL M. DAUGERDAS,
DONNA GUERIN,
DENIS FIELD, and
DAVID PARSE,

Defendants.

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ECF CASE

Case No. S3 09 Cr. 581 (WHP)

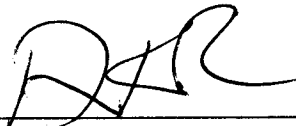
AFFIDAVIT OF DAVID PARSE

STATE OF NEW YORK)
 ss.:
COUNTY OF NEW YORK)

DAVID PARSE, being duly sworn, deposes and says:

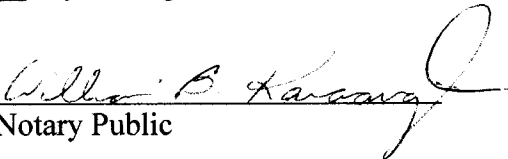
1. My name is David Parse, and I am a defendant in the above-captioned case.
2. During jury selection (or shortly thereafter), I heard one of the lawyers at the Brune firm (I believe it was Theresa Trzaskoma) say that there was a prospective juror (or a juror) who had the same name as a suspended attorney but that it was not the same person. I cannot recall if the lawyer was speaking to me or if I overheard her speaking to someone else.
3. A week after the verdict, I met with the Brune lawyers to discuss possible post-trial motions and appellate issues. The possibility of a juror misconduct issue was not raised.
4. It was not until after the Brune firm filed its motion for a new trial that I learned that prior to jury deliberations the issue of Conrad being a suspended lawyer had resurfaced. More precisely, to the best of my memory, it was after the July 15, 2011 conference call that I learned (i) that on May 12, 2011, Ms. Trzaskoma had considered the possibility that Juror No. 1

was the suspended lawyer, (ii) that a paralegal had generated a Westlaw report, and (iii) that the Brune lawyers had concluded that Conrad was not the suspended attorney and determined that there was no need to inform the Court.



David Parse

Sworn to before me this
3rd day of August, 2012



Notary Public

